

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

JOHN FORST AND CHRISTINE HOPKINS	)	
	)	
	)	Case Number 1:21-CV-227
Plaintiffs,	)	
	)	
vs.	)	
	)	
	)	JURY TRIAL DEMANDED
TRAVELERS HOME AND MARINE	)	
INSURANCE COMPANY	)	
	)	
Defendant.	)	
	)	

**COMPLAINT FOR PROPERTY DAMAGE**

Plaintiffs, John Forst and Christine Hopkins, for their claims against the Defendant, Travelers Home and Marine Insurance Company (hereinafter "Travelers") allege and say:

1. Plaintiffs, John Forst and Christine Hopkins, are citizens of the State of Indiana at the time of this incident.
2. Defendant, Travelers Home and Marine Insurance Company, is a corporation with its principal office in the State Connecticut and incorporated under the laws of Connecticut.
3. This Court has jurisdiction over this case pursuant to U.S.C. § 1332 (a)(1) because the parties are citizens of different states and the amount in controversy is over Seventy Five Thousand Dollars (\$75,000).
4. Venue is in this District since the damage occurred at 229 Eagle Cliff Cove, Huntertown, Indiana.
5. At all times relevant herein, Plaintiffs' residence and its contents were covered by a Home Owners Policy No. 983613782 6331. A copy of that insurance policy and the declaration sheet are attached herewith as "Exhibit 1".

6. During the week of February 6, 2021, the drywall in the ceiling of the master bedroom of Plaintiffs' home collapsed causing extensive damage to the structure and personal property located therein.
7. Plaintiffs provided notice of the claim to Defendant, Travelers, for the loss.
8. Defendant, Travelers, denied the Plaintiffs' claim.
9. Plaintiffs are entitled to the coverage provided by the Travelers Home Owner Policy to the full compensation of their substantial losses less the deductible provided in the policy.

WHEREFORE, Plaintiffs, John Forst and Christine Hopkins, respectfully request that judgment be entered in their favor and against Defendant, Travelers, in an amount that will reasonably compensate Plaintiffs for the damages arising from the occurrence, for prejudgment interest, that costs be assessed against Defendant, Travelers, and for all other just and proper relief in the premises.

**Demand for Jury Trial**

Plaintiffs, John Forst, and Christine Hopkins, hereby demand a trial by jury of all issues in this case.

Respectfully submitted,

**ROTHBERG LOGAN & WARSCO LLP**

s/ Edward L. Murphy, Jr.

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